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August 11, 2022

**BY ECF**

Hon. Vernon S. Broderick, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *King v. Fedcap Rehabilitation Services, Inc., et al.*,  
Case No. 20-cv-01784

Dear Judge Broderick:

We are counsel to Plaintiff and write, on consent of Defendants, pursuant to the Court's Order at Dkt. 102, to provide a status update.

We are pleased to report that a class settlement in principle was reached during mediation. The settlement will resolve, on a class-wide basis, both the instant action brought by Harold King (the "*King* Action"), as well as the action brought in New York County Supreme Court, under Index 152683/21, by Brickzaida Aponte (the "*Aponte* Action"). However, because the *Aponte* Action has already been certified as a class under CPLR Article 9 by Hon. Sabrina Kraus, J.S.C. on January 31, 2022, we believe it would be more appropriate to obtain class settlement approval through the *Aponte* Action. We intend to designate Mr. King, plaintiff in this action, as a "class representative" in the *Aponte* Action, for which he will apply for a service award.

In view of the foregoing, we respectfully request the Court to stay this matter until receiving confirmation from counsel that class settlement approval has been granted in the *Aponte* Action. Thereafter, the parties will submit a stipulation of dismissal to Your Honor to close the *King* Action.

We thank the Court for its kind consideration.

Respectfully,  
/s/ C.K. Lee  
C.K. Lee, Esq.

cc: all parties via ECF